

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

ALI EL-KHALIL, D.P.M.,

Plaintiff,

Civil Action No. 18-cv-12759
Hon. Mark A. Goldsmith

v.

ANTHONY TEDESCHI, MOHAMMED KHALIL, NSIMA USEN,
MAHMUD ZAMLUT, LEONARD ELLISON and
THE DETROIT MEDICAL CENTER,
A Domestic Not for Profit Corporation, jointly and severally

Defendants.

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PRELIMINARY WITNESS LIST FOR DEFENDANT, NSIMA USEN, D.P.M.

NOW COMES the Defendant, NSIMA USEN, D.P.M., by his attorneys,
TANOURY, NAUTS, McKINNEY & GARBARINO, PLLC, and for his Preliminary
Witness List, States as follows:

1. Ali El-Khalil, D.P.M.; Plaintiff
2. Nsima Usen, D.P.M.
3. Vangjo Cobani, D.P.M.
4. Mitchell Holloway—FBI
5. Dr. Wathiq Saka
6. Zeeshan Hussain, D.P.M.
7. Dr. Syed Raza
8. Mohammad Khalil, D.P.M
9. Dr. Elias Kassab
10. Dr. Mahir Elder
11. Dr. Chadi Saad
12. Tameka Taylor, D.P.M.
13. Ali Jabber, as Identified in Plaintiff's Answers to Interrogatories
14. Hassan Bazzi, as Identified in Plaintiff's Answers to Interrogatories
15. Safwan Saker, as Identified in Plaintiff's Answers to Interrogatories
16. Jaleel Quadir, as Identified in Plaintiff's Answers to Interrogatories
17. Nabil Metwally, as Identified in Plaintiff's Answers to Interrogatories
18. Patient's A and B as identified in Plaintiff's Complaint
19. Representatives from the Federal Bureau of Investigation with knowledge
of Plaintiff's Conduct.

20. Representative(s) from the Defendant Detroit Medical Center
21. Representative(s) of Belle Fountain Nursing & Rehabilitation Center
22. Representative(s) of Four Seasons Rehabilitation & Nursing Center
23. Representative(s) of Sinai Grace Hospital
24. Representative(s) of Beaumont Health and its various hospital entities with knowledge of Plaintiff's conduct.
25. Representative(s) of Henry Ford Health and its various hospital entities with knowledge of Plaintiff's conduct.
26. Representative(s) of Providence Health System and its various hospital entities with knowledge of Plaintiff's conduct.
27. Representative(s) of any and all other nursing homes, centers, hospitals, and clinics which Plaintiff has privileges, an affiliation and/or treats patients.
28. Any and all persons known now or later discovered which Plaintiff made defamatory statements regarding Defendant.
29. Any and all witnesses disclosed in further depositions, investigation or discovery.
30. Any and all witnesses listed or called by another party.
31. Any and all necessary identification/authentication witnesses.
32. Any and all necessary rebuttal witnesses/impeachment witnesses.
33. Expert Witness(es), if necessary.

34. Defendant reserves the right to file an amended witness list, if necessary.

TANOURY, NAUTS, McKINNEY
& GARBARINO, PLLC

BY: /s/ Paul G. Huebner
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DATED: February 7, 2020

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was served upon counsel of record and any unrepresented parties via the Court's ECF System with their respective e-mail or First Class U.S. mail addresses disclosed on the Notice of Electronic Filing on February 7, 2020.

/s/ Denise S. Seccia
DENISE S. SECCIA